

CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JANE DOE 2,

Plaintiff,

v.

RED ROOF INNS, INC., et al.,

Defendants.

**PL Sum. J.
Ex. 072**

Civil Action No.
1:19-cv-03841-WMR

**PLAINTIFF JANE DOE 2'S OBJECTIONS AND RESPONSES TO
DEFENDANT RED ROOF INNS, INC.'S INTERROGATORIES**

Plaintiff Jane Doe 2 ("Plaintiff" or "Jane Doe 2") hereby provides objections and responses to Defendant Red Roof Inns, Inc.'s ("Defendant" or "RRI") Interrogatories (the "Interrogatories"). Plaintiff reserves the right to amend and supplement these responses as discovery progresses.

GENERAL OBJECTIONS

1. Plaintiff objects to these Interrogatories because the total number of Interrogatories, together with identifiable subparts, exceeds the total permitted by the Federal Rules of Civil Procedure. Plaintiff should not be required to speculate at her peril, in selecting which Interrogatory to respond to.

CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

know what name they would have used to do so (although it may have been their own names). Later when Jane Doe 2 was trafficked by Quan, Jane Doe 2 used her actual ID to reserve rooms at this hotel. Just as with other hotels, CB would have had with him an associate named Big E with him.

While Jane Doe 2 was trafficked at these three hotels, she and other trafficking victims exhibited numerous well-known and visible signs of a sex trafficking victim, including physical deterioration, malnourishment, poor hygiene, fatigue, sleep deprivation, injuries, a failure to make eye contact with others, lack of control and possession of money, physical evidence of beatings by her trafficker, and monitoring by her traffickers. While Jane Doe 2 was trafficked at these hotels, her room, and the rooms of other victims, evidenced numerous well-known and visible signs of sex trafficking.

Frequently, the trash cans in the rooms in which Jane Doe 2 was trafficked contained an extraordinary number of used condoms. And on occasion, the toilet would clog because of so many flushed condoms. The rooms also contained multiple cell phones. She also frequently requested an excessive amount of towels from housekeeping.

Multiple other employees of these three hotels participated in, assisted and facilitated the sex trafficking that occurred at these three hotels. At this